

EXHIBIT 2

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

	-	-	-
SHABTAI SCOTT SHATSKY,)	Case No. 18-Civ. 12355	
individually and as)		
personal representative)	CONFIDENTIAL	
of the Estate of Keren)	VIRTUAL VIDEOTAPED	
Shatsky, J ANNE)	DEPOSITION OF NADIA	
SHATSKY, individually)	GHANNAM	
and as personal)		
representative of the)		
Estate of Keren)		
Shatsky, TZIPPORA)		
SHATSKY SCHWARZ, YOSEPH)		
SHATSKY, SARA SHATSKY)		
TZIMMERMAN, MIRIAM)		
SHATSKY, DAVID RAPHAEL)		
SHATSKY, GINETTE LANDO)		
THALER, individually)		
and as personal)		
representative of the)		
Estate of Rachel)		
Thaler, LEOR THALER,)		
ZVI THALER, ISAAC)		
THALER, HILLEL)		
TRATTNER, RONIT)		
TRATTNER, ARON S.)		
TRATTNER, SHELLEY)		
TRATTNER, EFRAT)		
TRATTNER, HADASSA)		
DINER, Yael HILLMAN,)		
STEVEN BRAUN, CHANA)		
FRIEDMAN, ILAN)		
FRIEDMAN, MIRIAM)		
FRIEDMAN, YEHIEL)		
FRIEDMAN, ZVI FRIEDMAN,)		
and BELLA FRIEDMAN,)		
)		
)		
Plaintiffs,)		
)		
)		
against)		
)		
)		
)		
)		

1)
THE PALESTINE)
2 LIBERATION ORGANIZATION)
and THE PALESTINIAN)
3 AUTHORITY (a/k/a "The)
Palestinian Interim)
4 Self-Government)
Authority" and/or "The)
5 Palestinian National)
Authority"),)
6)
7 Defendants.)

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VIRTUAL VIDEOTAPED DEPOSITION OF NADIA

GHANNAM, witness herein, called by the
Plaintiffs, for examination, taken pursuant to
the Federal Rules of Civil Procedure, by and
before Karen A. Nickel, a Certified Realtime
Reporter and a notary public in and for the
Commonwealth of Pennsylvania, held remotely
with all parties appearing from their
respective locations, on Friday, July 23, 2021,
at 9:30 a.m.

COUNSEL PRESENT:

For the Plaintiffs:

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For the Defendants:

Mitchell R. Berger, Esq.
Joseph Alonzo, Esq.
Salim Kaddoura, Esq.
Squire Patton Boggs
2550 M Street NW
Washington, DC 20037

Also Present: Cosette Vincent
Eszter Vincze

- - -
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INTENTIONALLY OMITTED**

1 A. No.

2 Q. And what was your title when you
3 moved to the Observer Mission?

4 A. My new title and new position was
5 the advisor on media affairs.

6 Q. Advisor on media affairs, okay. And
7 is that the title that you currently hold at
8 the Observer Mission?

9 A. Yes.

10 Q. And have you held that title at all
11 times since January 4 of 2020?

12 A. Yes.

13 Q. So in your role as advisor on media
14 affairs at the Observer Mission -- let me
15 withdraw that.

16 What is the purpose of the media
17 affairs function at the Observer Mission?

18 A. The purpose is to elevate the work
19 of Palestine as mandated through our work at
20 the United Nations.

21 Q. To elevate the work in what respect?

22 A. Through the use of various media
23 outlets and platforms.

24 Q. And what is the purpose of elevating
25 the work of the Observer Mission?

1 A. To enhance and, basically, project
2 the work of the United Nations in hopes of
3 accomplishing their mandate of seeing a just
4 resolution to the Palestine question.

5 Q. And when you say promoting, you
6 know, when you say promoting, who do you --
7 promoting to who?

8 A. To the international community and
9 to whoever chooses to sign in, listen to
10 whatever the mandate that the UN has.

11 Q. So that would include, for example,
12 the American public?

13 MR. BERGER: Objection, first
14 of all, she didn't use the word "promoting" and
15 you have loaded up the question with that. So
16 I object to the form of the question as
17 misstating her prior testimony, but you may
18 answer.

19 THE WITNESS: It includes
20 anybody in the international community that
21 would like to voluntarily log in to our various
22 media platforms that are tied to the UN
23 mandate.

24 So if the American public is -- are
25 people that want to chime in, they are more

1 than welcome to.

2 BY MR. SINAIKO:

3 Q. Would it be fair to say that the
4 purpose -- the purpose of media affairs is to
5 get the broadest possible attention to the work
6 of the Observer Mission?

7 A. I think it would be fair to say that
8 the purpose of the media is to bring as much
9 attention to the plight of the illegal
10 occupation of the Palestinian people as
11 mandated through our work with the United
12 Nations.

13 Q. Okay. So is there, in your view, a
14 material difference between the role you play
15 at the Observer Mission today and the role you
16 previously played when you worked at the
17 Palestinian Diplomatic Mission to the United
18 States?

19 A. Absolutely, yes.

20 Q. And what is the difference?

21 A. When I worked at the UN Mission to
22 the U.S., I worked as a public relations and
23 outreach advisor -- well, a director, I should
24 say, and now that I am employed at the UN
25 Mission of the Permanent Observer State of

**THESE PAGES HAVE BEEN
INTENTIONALLY OMITTED**

1 A. Correct.

2 Q. Anywhere in the world?

3 A. Yes.

4 Q. So anyone, any person in the United
5 States with access to the Internet and a
6 Facebook account would be able to see those
7 posts; correct?

8 A. Yes. I have never changed the
9 privacy setting since I started working there.

10 Q. Okay. Now, this -- you probably
11 know this better than I do because you are the
12 media affairs person; is it possible to create
13 similar restrictions with respect to a Twitter
14 account?

15 A. That is a good question. I don't
16 think so.

17 Q. Okay. So, to your knowledge --

18 A. No.

19 Q. To your knowledge, any person with
20 access to Twitter can see anything that the
21 Observer Mission posts on its Twitter account?

22 A. Yes.

23 Q. Okay. So as far as you know, the
24 information that you post to the Observer
25 Mission's Twitter account goes to the public at

1 large; correct?

2 A. Yes.

3 Q. Would it be fair to say that you
4 regard it as important that the Observer
5 Mission's Facebook and Twitter account postings
6 get the broadest possible distribution?

7 A. Yes.

8 Q. And the Twitter and Facebook account
9 postings that you make to the accounts that are
10 maintained by the Observer Mission, are those
11 accounts -- are those postings ever in a
12 language other than English?

13 A. Yes.

14 Q. How frequently are there postings
15 that are not in the English language?

16 A. Very, very, very infrequently.

17 Q. Very infrequently?

18 A. Correct.

19 Q. So would you say that in excess of
20 90 percent of the postings on the Observer
21 Mission's Facebook and Twitter accounts are in
22 the English language?

23 A. If not more, yes.

24 Q. Okay. And, again, this will be a
25 question I'm asking you because you probably

1 know this stuff better than I do being the
2 media affairs person; what is the function of a
3 hashtag on a Twitter post or a Facebook post?

4 A. So that people can follow it in the
5 search engine.

6 Q. When you say so people can follow it
7 in a search engine, what do you mean exactly?

8 A. So, for example, in Twitter, there
9 are certain things that are trending, things
10 trend, that's how you know what's popular.

11 So, for example, recently, one of
12 the hashtags I have been using is
13 SaveSheikhJarrah, it's a hashtag, is the
14 illegal move by settlers or whatever to remove
15 people who have lived in this neighborhood for
16 decades.

17 So it's trending. So people -- if
18 you put in the hashtag, #SaveSheikhJarrah, you
19 can then begin to see who is tweeting any
20 information under that specific hashtag.

21 Q. So would it be fair to say, then,
22 that using the hashtag SaveSheikhJarrah is a
23 means of getting attention to Twitter or
24 Facebook posts that are on the Observer Mission
25 account and that relate to that topic?

1 A. Yes.

2 Q. And would it be fair to say that the
3 use of hashtags, again, I'll just restrict it
4 for the moment to the SaveSheikhJarrah hashtag,
5 that the use of that hashtag enhances the
6 ability of the Mission to disseminate its
7 message around activities related to Sheikh
8 Jarrah?

9 A. If you are a Twitter user and you
10 know how to use Twitter, you would know that
11 hashtags are the only way that your message is
12 going to get disseminated widely. Otherwise,
13 it just falls to the fray.

14 Q. So would it be fair to say that the
15 very purpose of putting hashtags on these
16 messages or these Twitter postings and Facebook
17 postings is to ensure that your -- that the
18 postings reach the broadest possible audience?

19 A. Correct.

20 Q. Okay. And it's your intention, by
21 using hashtags, to ensure that the postings on
22 the Observer Mission's Twitter and Facebook
23 feeds reach the broadest possible audience;
24 correct?

25 A. Not always. Sometimes I hashtag

1 information that isn't necessarily going to get
2 a wide, broad audience, but it's the ethical
3 and the right thing to do based on the UN
4 mandate.

5 There might be, for example,
6 Resolution 2334, that is not a hashtag you are
7 ever going to find trending. However, because
8 I like to educate the public and that's one of
9 the mandates of the UN is to educate, I will
10 hashtag 2334 in hopes that maybe one person
11 might get educated and that's enough for me.
12 So it really varies, the strategy varies every
13 single time. So it's not necessarily a means
14 to get the word out to as many people as
15 possible.

16 Q. So to take the SaveSheikhJarrah
17 hashtag for just a moment, I think you said you
18 use that one; right?

19 A. That is correct.

20 Q. And the use of the SaveSheikhJarrah
21 hashtag, the purpose of that is to ensure the
22 widest possible dissemination of the message
23 that the Observer Mission is disseminating in
24 its Facebook and Twitter posts on that topic;
25 correct?

1 A. Yes, although I don't use hashtags
2 as frequently on Facebook. I do do it just for
3 an aesthetic thing. It looks nice. And for
4 people who follow both platforms, sometimes
5 they link onto Twitter and Facebook, but
6 hashtags are more so used for Twitter.

7 Q. Okay. So, again, the purpose, then,
8 restricting it to Twitter for a moment, the use
9 of the SaveSheikhJarrah hashtag on Twitter, the
10 purpose of using that hashtag is to ensure the
11 broadest possible dissemination of the messages
12 on that topic that the Observer Mission, you
13 know, posts to its Twitter account?

14 A. Yes.

15 Q. Okay. And in the instance of
16 SaveSheikhJarrah, just to take that as an
17 example, the message that the Observer Mission
18 disseminates through its Twitter and Facebook
19 feeds is that activity relating to Sheikh
20 Jarrah is illegal; correct?

21 A. Correct. The UN has circulated many
22 documents, articles, so forth, stating what is
23 happening in Sheikh Jarrah is illegal and it is
24 against UN human rights policies, international
25 law, international human rights laws, various

1 UN resolutions, and it's illegal in nature.

2 And yes, therefore, it was in the
3 framework of my work to disseminate information
4 within the context of the United Nations.

5 Q. Right. And disseminating the view
6 of the Observer Mission that activity relating
7 to Sheikh Jarrah is illegal is an important
8 part of your work at the Observer Mission;
9 correct?

10 A. Yes, because part of my work is to
11 elevate the messaging of the United Nations.
12 That's part of my work as the media advisor.

13 Q. Well, let me ask this. Isn't it to
14 elevate the work of the --

15 A. In the United Nations because it's
16 not just the Permanent Observer Mission of the
17 State of Palestine that ties onto these
18 documents. There are many countries that are
19 in agreement. I mean, many.

20 I mean, if you log onto Security
21 Council meetings, you can hear Ireland, you can
22 hear Norway, you can hear many of these
23 countries who take the lead. We're not even --
24 we can't even be a permanent representative in
25 the Security Council so many countries speak on

1 the illegal occupation of the State of
2 Palestine. It's not just our mandate.

3 Q. I didn't mean to interrupt. I'm so
4 sorry. I think I might have cut you off
5 inadvertently.

6 A. That's okay.

7 Q. Your Twitter posts -- not your
8 Twitter posts, the Twitter posts that go on the
9 Observer Mission's Twitter and Facebook feeds,
10 those are the messaging of the Observer Mission
11 and not of the United Nations and not of any
12 other -- any Member State or any other member
13 organization; correct?

14 A. That is correct.

15 Q. Okay. When you post to -- well, let
16 me ask this. On and after January 4, 2020, I
17 think we have established that you are the only
18 person who has posted to the Observer Mission's
19 Twitter and Facebook accounts; correct?

20 A. Correct.

21 Q. And on and after January 4, 2020,
22 have you made posts to those two social media
23 accounts, that is, the Facebook account and the
24 Twitter account, from the Observer Mission
25 building at 115 East 65th Street in Manhattan?

1 A. Since January 4?

2 Q. Since January 4 of 2020, that is
3 correct.

4 A. Yes, I have.

5 Q. And how many times would you say,
6 just ballpark, on and after January 4, 2020,
7 you have posted to the Twitter account or the
8 Facebook account of the Observer Mission from
9 the Observer Mission building at 115 East 65th
10 Street in Manhattan?

11 A. To take a guess, February, Twitter,
12 maybe 60 times. Facebook, maybe 15 times.
13 Maybe a dozen times.

14 Q. And the reason that that number is
15 in the range you just mentioned is because of
16 the pandemic; correct?

17 A. That is correct.

18 Q. And subsequent to, on or subsequent
19 to January 4, 2020, how many times would you
20 say you have posted or you have made a post to
21 the Observer Mission's Facebook account?

22 A. After January 4 -- excuse me, 2020?

23 Q. On and after January 4 of 2020.

24 A. Facebook? God, I mean, I don't
25 know. I just don't know. That's just a very

1 specific question. I don't know. Maybe once a
2 week. Do the math. I don't know. Once a week
3 since January 2020, on average.

4 Q. So you use Facebook -- oh, sorry.
5 Didn't mean to interrupt.

6 A. It's okay. I can't do the math in
7 my head for you. I don't know.

8 Q. Would it be fair to say that you
9 post to the Observer Mission's Facebook account
10 less than you post to the Observer Mission's
11 Twitter account?

12 A. Yes.

13 Q. Okay. On and after January 4 of
14 2020, how many times would you say that you
15 have posted to the Observer Mission's Twitter
16 account from the building at 115 East 65th
17 Street?

18 A. From the building, like I said,
19 probably around 60 times. I'm just averaging
20 once a day.

21 Q. Okay. And putting aside -- you
22 know, putting aside from the building, you
23 know, from the building at 115 East 65th
24 Street, how many times would you say, in total,
25 you have posted to the Observer Mission's

1 Twitter account on or after January 4, 2020?

2 A. I couldn't even count. Wouldn't
3 even be able to give you a ballpark. A lot.

4 Q. But it's a large number; right?

5 A. Yes.

6 Q. And are you aware, I don't know,
7 I'll ask, are you aware of the location of the
8 servers where the Facebook and Twitter accounts
9 maintained by the Observer Mission reside, you
10 know, the Twitter and Facebook --

11 A. Servers?

12 Q. Yeah.

13 A. No.

14 Q. Okay. Have you ever posted -- well,
15 withdrawn.

16 On and after January 4, 2020, have
17 you ever posted to the Observer Mission's
18 Facebook account other than from within the
19 territory of the United States?

20 A. I have only posted in the United
21 States.

22 Q. Okay. And with respect to the
23 Observer Mission Twitter account, on and after
24 January 4, 2020, have you ever posted to the
25 Twitter account other than from the -- you

1 know, within the territory of the United
2 States?

3 A. I have only posted in the United
4 States.

5 Q. Okay. On and after January 4, 2020,
6 have you left the territory of the United
7 States?

8 A. No.

9 Q. Okay. And on and after -- I think I
10 know the answer to this already because we may
11 have covered it, and I apologize if I'm asking
12 again, I'm just trying to keep all the
13 questions together in the transcript. On and
14 after January 4, 2020, has anybody other than
15 you made a post to either the Observer Mission
16 Facebook account or the Observer Mission
17 Twitter account?

18 A. No.

19 MR. SINAIKO: Okay. So I
20 would ask Cosette to put up on the screen for
21 our next exhibit, which I think is going to be
22 No. 6, all right, I would ask Cosette to put up
23 Tab 19.

24 (Deposition Exhibit No. 6 was
25 marked for identification.)

1 BY MR. SINAIKO:

2 Q. Ms. Ghannam, do you see the
3 document? We're marking this as Exhibit 6. Is
4 it 6? It is 6. We are marking as Exhibit 6
5 the document that I just put up on the screen.
6 Can you see it in front of you?

7 A. Yes.

8 Q. And do you recognize that to be a
9 tweet that you posted to the Observer Mission's
10 Twitter account?

11 A. Yes, I would have written it. But
12 I'm just reading it.

13 Q. Oh, sure. Take your time. If you
14 want to read the -- any document you want to
15 read, feel free, just let us know that you want
16 to read it and we'll turn the pages. You
17 should do whatever you think you need to.

18 A. It's okay. I just want to read the
19 tweet real quickly. Okay, yes.

20 Q. And let me ask a question. And
21 again, I apologize if this question betrays a
22 little bit of lack of knowledge on my part.

23 But was this a retweet of a tweet
24 that had originally been posted by the PLO's
25 Department of Public Diplomacy and Policy?

1 A. Yes.

2 MR. SINAIKO: And Cosette, can
3 we just turn the page here?

4 BY MR. SINAIKO:

5 Q. This document that is now on the
6 screen in front of you, it's another page of
7 Exhibit 6, is this the tweet that was reposted?

8 A. No.

9 Q. Okay. Is this the document that was
10 attached to the tweet that was reposted?

11 A. Not that I recall.

12 Q. Okay. Let's back it up here. Just
13 back up one page.

14 You see what the original -- the
15 original PLO Department of Public Diplomacy and
16 Policy tweet says?

17 A. Yes.

18 Q. Okay. Do you see it makes reference
19 to an official position?

20 A. Yes.

21 Q. And the document that we -- or the
22 page that we showed you a moment ago, is that a
23 copy of the official position that the PLO
24 Department of Public Diplomacy and Policy
25 released along with this tweet?

1 A. It looks like it was down to me.
2 There is nothing written in it other than
3 something in Arabic and it was just one word.

4 Q. Oh. Let's go to the next page. I
5 think there was probably some text at the
6 bottom that you were having difficulty seeing.

7 A. Oh, I can't -- there's no way I can
8 read that.

9 Q. Let's zoom in a little bit. There
10 we go. Is that better?

11 A. Yes, it's better. I mean, I'm not
12 going to read all of it. It's going to waste
13 everyone's time. Okay. What is the question?

14 Q. So the question is, is that the
15 position statement that was attached to the PLO
16 Department of Public Diplomacy -- I'm sorry,
17 Public Diplomacy and Policy that was attached
18 to the tweet that the Observer Mission
19 retweeted?

20 A. It appears so, if it is attached to
21 it.

22 MR. SINAIKO: Let's go to Tab
23 20, and we will mark that as Exhibit 7.

24 (Deposition Exhibit No. 7 was
25 marked for identification.)

1 BY MR. SINAIKO:

2 Q. And do you recognize this to be
3 another tweet that was posted to the Observer
4 Mission's Twitter feed?

5 A. I retweeted it, but yes.

6 Q. Well, I mean, I guess it's a
7 question. Do you recognize this to be a tweet
8 that you posted to the Observer Mission's
9 Twitter account?

10 A. Yes.

11 Q. Okay.

12 A. Yes.

13 Q. And you see that this document has
14 the hashtag LandsDay?

15 A. Yes.

16 Q. Is the hashtag LandsDay one of those
17 hashtags that's designed to maximize the
18 dissemination of the message in the tweet?

19 A. That particular context, I am not
20 sure if I was trying to maximize it or just
21 commemorate the day.

22 Q. In general, though -- well,
23 withdrawn.

24 And in this tweet, you are actually
25 retweeting -- well, withdrawn. Let me try this

1 question one more time.

2 This is actually a retweet of a
3 tweet that was posted by another organization
4 within the Palestine Liberation Organization;
5 correct?

6 A. Yes, the Negotiation Affairs
7 Department, yes.

8 Q. Okay. And the purpose of this tweet
9 was to disseminate publicly the Observer
10 Mission's view and the view of the PLO that
11 Israel was engaged in violations against the
12 land and people of Palestine; is that correct?

13 MR. BERGER: Object to the
14 form of the question.

15 BY MR. SINAIKO:

16 Q. You may answer.

17 A. The purpose of this tweet is to
18 highlight the violations that the United
19 Nations continuously addresses against the
20 people of Palestine and those that are
21 illegally occupied.

22 These violations are deemed by --
23 against many international human rights groups,
24 international human rights law, so these are
25 violations not just by Palestinian Missions to

1 the United Nations, but violations that are
2 also discussed at the United Nations.

3 Q. Okay. But the purpose of the tweet
4 is, just to cut through it, one of the purposes
5 of the tweet, at least, is to publicize these
6 -- these violations; correct?

7 MR. BERGER: Object to the
8 form of the question. Asked and answered.

9 BY MR. SINAIKO:

10 Q. You may answer. Do you need the
11 question back?

12 A. No. The purpose of the tweet is to,
13 once again, highlight the illegal violations,
14 as noted in the United Nations, that are
15 conducted against a people that are occupied.
16 This is something that is legally embedded in
17 the charter of the United Nations. Therefore,
18 once again, I am doing my work as the advisor
19 to the Permanent Observer Mission of the State
20 of Palestine to the United Nations to educate
21 people on violations that are deemed illegal by
22 the United Nations.

23 Q. Understood.

24 MR. SINAIKO: Okay. Let's go
25 to our next tab. This is going to be Tab 22.

1 I think we'll mark it as Exhibit 7; is that
2 right?

3 THE COURT REPORTER: Exhibit
4 8.

5 MR. SINAIKO: Exhibit 8,
6 sorry.

7 (Deposition Exhibit No. 8 was
8 marked for identification.)

9 BY MR. SINAIKO:

10 Q. Oh, I'm so sorry, I meant to put up
11 Tab 21. And, actually, before we do that, let
12 me just go back to -- let me go back to -- let
13 me go back to Tab 19. That's Exhibit 6. Yeah.
14 Let's just go back to that for one moment.

15 So this tweet here, you see at the
16 -- you see underneath the tweet, it's dated
17 1:59 p.m. -- do you have Exhibit 6 in front of
18 you on the screen? I can't hear you, ma'am.

19 Ms. Ghannam, can you hear me? I'm
20 having difficulty hearing anything right now.

21 THE COURT REPORTER: I cannot
22 hear her either.

23 MR. SINAIKO: I think we have
24 lost the audio.

25 THE VIDEOGRAPHER: Would you

1 like to go off the record?

2 MR. SINAIKO: Well, we need to
3 get the audio working. I mean, whatever we
4 have to do. If we have to go off the record to
5 get the audio working, then fine.

6 THE VIDEOGRAPHER: Okay. We
7 are now off the record. The time is 17:24 UTC
8 time.

9 (Discussion held off the
10 record.)

11 THE VIDEOGRAPHER: We are
12 back on the record. The time is 17:26 UTC
13 time.

14 BY MR. SINAIKO:

15 Q. Ms. Ghannam, we are back on the
16 record. Can you see that I have put Exhibit 6,
17 Deposition Exhibit 6 back on the screen in
18 front of you?

19 A. Yes, I can see it.

20 Q. And this is the retweet that we were
21 talking about a moment ago; correct?

22 A. Correct.

23 Q. Okay. And if you look at the bottom
24 of the tweet, you will see that it says, 1:59
25 p.m., February 4, 2020. Do you see that?

1 A. Yes.

2 Q. Would you agree that this was a
3 tweet that was posted at 1:59 p.m. on the 4th
4 of February 2020?

5 A. Yes.

6 Q. Okay. And would you agree that this
7 is a tweet that you posted from the UN --
8 withdrawn.

9 Would you agree that this is a post
10 that -- to Twitter that you made from the
11 Observer Mission building at 115 East 65th
12 Street in Manhattan at the date and time noted
13 on the tweet?

14 A. Most likely, yes, unless I wasn't
15 tweeting from my lunch break because it's close
16 to 2:00.

17 Q. But you would say most likely, just
18 to be clear, you would say most likely --

19 A. Yes.

20 Q. -- you tweeted that from inside the
21 Observer Mission building at 115 East 65th
22 Street in Manhattan?

23 A. Most likely, yes.

24 Q. Let's go back to tab, I think we
25 said Tab 21, and we're marking that as Exhibit

1 8.

2 MR. SINAIKO: Karen, did you
3 get that?

4 THE COURT REPORTER: Yes.
5 Exhibit 8, yes.

6 MR. SINAIKO: Yeah. Let's put
7 up Tab 21. That will be Exhibit 8.

8 BY MR. SINAIKO:

9 Q. All right. And Ms. Ghannam, do you
10 see Exhibit 8 in front of you?

11 A. Yes.

12 Q. Do we agree that this is another
13 tweet that you posted to the Observer Mission's
14 Twitter account?

15 A. Yes.

16 Q. Do we agree that this is a tweet
17 that you posted at 9:00 a.m., on April 12,
18 2020, as stated at the bottom of the tweet?

19 A. Yes.

20 Q. And this is actually a retweet; is
21 that right?

22 A. Yes.

23 Q. And you were retweeting on behalf of
24 the Observer Mission, to the Observer Mission's
25 Twitter account, a tweet that had originally

1 been posted by the PLO Department of Public
2 Diplomacy and Policy; correct?

3 A. Correct. Yes.

4 Q. And this is another communication by
5 the PLO relating to annexation of land in the
6 West Bank; is that correct?

7 MR. BERGER: Object to the
8 form of the question.

9 BY MR. SINAIKO:

10 Q. You may answer.

11 A. It appears so. I can't read all of
12 it, but I believe it was a statement put out by
13 Dr. Ashrawi regarding annexation.

14 Q. Okay. And that was something that
15 you felt the Observer Mission should
16 disseminate on Twitter; correct?

17 A. Absolutely. Annexation is one of
18 the biggest illegal moves that speaks against
19 everything that you can possibly read in the UN
20 charter regarding the illegal occupation of the
21 State of Palestine.

22 Q. Would it be fair to say that you
23 felt it was important to raise public awareness
24 on this issue by making this Twitter post?

25 A. Yes.

1 MR. SINAIKO: Let's go to Tab
2 22, which we are going to mark as Exhibit 9.

3 (Deposition Exhibit No. 9 was
4 marked for identification.)

5 BY MR. SINAIKO:

6 Q. And Ms. Ghannam, do you have Exhibit
7 9 in front of you?

8 A. I do.

9 Q. And do you recognize this to be a
10 retweet that you made to the Observer Mission's
11 Twitter account on April 28, 2020, at 6:30
12 p.m.?

13 A. Yes.

14 Q. Okay. And do you recognize this
15 also to be a retweet?

16 A. Yes.

17 Q. And what is it a retweet of?

18 A. It was posted by the Institute of
19 Middle East Understanding on, once again,
20 illegal settlements on Palestinian land that
21 the United Nations opposes, and there's several
22 resolutions that oppose it and it is deemed
23 illegal.

24 Therefore, I felt it was extremely
25 important, on behalf of our Mission to the

1 United Nations, to continue working under the
2 mandate of the UN by elevating the illegal
3 issue of settlement expansion.

4 Q. When you say elevating the illegal
5 issue of expansion, you mean raising public
6 awareness on that topic by disseminating --

7 A. Correct.

8 Q. To bring attention?

9 A. Correct.

10 MR. SINAIKO: Okay. Let's go
11 to Tab 23, and I think we are on Exhibit 10.

12 (Deposition Exhibit No. 10 was
13 marked for identification.)

14 BY MR. SINAIKO:

15 Q. Ms. Ghannam, can you see Deposition
16 Exhibit 10 on the screen in front of you?

17 A. Not yet.

18 Q. I think we may be having another
19 technical problem. It looks like the video is
20 frozen. Can you hear me?

21 A. I can hear you, yes.

22 Q. Can you see Exhibit 10 on the screen
23 in front of you?

24 A. No.

25 MR. SINAIKO: Okay. We

1 definitely are having a technical problem
2 because I, in my Zoom, I can see Exhibit 10 on
3 the screen in front of me, but I think Ms.
4 Ghannam is unable to see it. And we need to
5 resolve that.

6 MR. BERGER: Let me see if I
7 can show her on my laptop, if that will solve
8 the problem.

9 THE WITNESS: Yes, I can see
10 this.

11 MR. SINAIKO: Great.
12 Actually, mine is working again. Okay.

13 BY MR. SINAIKO:

14 Q. Do you recognize this to be a tweet
15 that you posted to the Observer Mission's
16 Twitter account?

17 A. Yes.

18 Q. And when did you make this Twitter
19 post?

20 A. It looks like May 11 at 3:03 p.m.

21 Q. Do you know where you were -- I
22 mean, do you know where you were physically
23 located at the time you made this Twitter post?

24 A. May 11th, I was in Washington.

25 Q. Okay. And the purpose of this

1 Twitter post was to raise public awareness of
2 Israeli annexation threat; is that correct?

3 A. Yes.

4 MR. SINAIKO: Let's go to Tab
5 40. That will be Exhibit 11.

6 (Deposition Exhibit No. 11 was
7 marked for identification.)

8 BY MR. SINAIKO:

9 Q. Ms. Ghannam, can you see Deposition
10 Exhibit 11 in front of you?

11 A. Yes.

12 Q. And can you tell me what you
13 recognize that document to be, if anything?

14 A. Yes. I believe it speaks to the
15 illegal annexation policy by the occupying
16 Tala (phonetic).

17 Q. Okay. And, more generally, you
18 recognize this to be a Twitter post on the
19 Observer Mission's Twitter feed; correct?

20 A. That is correct.

21 Q. And it's actually another retweet;
22 is that right?

23 A. That is correct.

24 Q. And what is it a retweet of?

25 A. It discusses 18 Senate Democrats, I

1 tagged them, expressing their concern regarding
2 unilateral annexation of Palestinian territory.

3 Q. And who made the original post?

4 A. It looks like -- oh, the original
5 post, excuse me, the PLO Department of Public
6 Diplomacy and Policy.

7 Q. Right. And that's an entity that is
8 part of one of the Defendants in this case;
9 correct?

10 A. I -- Public Diplomacy and Policy is
11 an extension of the type of work that the PLO
12 does, I suppose. I don't know whether or not
13 they are Defendants in this case or not, to be
14 quite frank with you. I just know from a media
15 standpoint, without --

16 Q. Let me put the question again.

17 Do you understand that the PLO
18 Department of Public Diplomacy and Policy is
19 part of the Palestine Liberation Organization,
20 one of the Defendants in this case?

21 MR. BERGER: Objection, calls
22 for a legal conclusion, but you can answer
23 again.

24 THE WITNESS: They are part of
25 the PLO, yes.

1 BY MR. SINAIKO:

2 Q. Okay. And you posted this -- well,
3 withdrawn.

4 Is it correct that you retweeted, on
5 the Observer Mission's Twitter account, the
6 original Twitter posts from the PLO Department
7 of Public Diplomacy and Policy to call
8 attention to the fact that members of the
9 United States Congress had expressed concerns
10 about annexation?

11 A. Because the United Nations is
12 encompassing, the United States is part of the
13 United Nations. Therefore, it becomes another
14 issue, when we talk about unilateral annexation
15 of Palestinian territory, the United States is
16 a member of the UN. Hence, this falls within
17 the frame of my work.

18 I am doing work on behalf of the
19 United Nations since the U.S. is a member of
20 the UN.

21 MR. SINAIKO: All right.

22 Let's go to Tab 41. I think this is going to
23 be 12. So let's mark the next document that
24 pops up as Exhibit 12.

25 (Deposition Exhibit No. 12 was

1 marked for identification.)

2 BY MR. SINAIKO:

3 Q. And Ms. Ghannam, can you see Exhibit
4 12 in front of you?

5 A. Yes.

6 Q. And what do you recognize that to
7 be?

8 A. A tweet, it looks -- just a tweet
9 regarding, it's watch now, which looks like
10 it's a video.

11 Q. Right. So this is a Twitter post
12 that you put on the Observer Mission's Twitter
13 feed on July 29 of 2020; correct?

14 A. Correct.

15 Q. And the purpose of this Twitter was
16 to encourage the public to watch the video that
17 was attached to the tweet; is that right?

18 A. Correct.

19 Q. And the video was prepared by the
20 PLO Department of Public Diplomacy and Policy;
21 correct?

22 A. It was prepared by them to highlight
23 the illegal annexation and the illegal
24 occupation of Palestinian territory, which are
25 considered crimes against humanity by the

1 United Nations, correct.

2 Q. Right. So the question was, this
3 was -- the question was, this is a video that
4 was prepared by the PLO Department of Public
5 Diplomacy and Policy; correct?

6 A. Correct.

7 MR. SINAIKO: Okay. Let's
8 mark -- let's put up Tab 24, which we will mark
9 as Exhibit 13.

10 (Deposition Exhibit No. 13 was
11 marked for identification.)

12 BY MR. SINAIKO:

13 Q. Ms. Ghannam, do you have Exhibit 13
14 in front of you?

15 A. I do see it, yes.

16 Q. And what do you recognize this
17 document to be?

18 A. It's something written against the
19 illegal use of administrative detention,
20 Palestinian prisoners.

21 Q. So let me just ask the question in a
22 little bit more focused way. Do you recognize
23 this to be a tweet that you posted to the
24 Observer Mission's Twitter feed?

25 A. Yes.

1 Q. And when did you make this post to
2 the Observer Mission's Twitter feed?

3 A. It looks like October 6, 2020, at
4 1:00 p.m.

5 Q. And this was also a retweet; is that
6 right?

7 A. Yes.

8 Q. And it was a retweet of a tweet
9 originally posted by the PLO Department of
10 Public Diplomacy and Policy; correct?

11 A. Yes.

12 Q. Okay. And the topic of this -- the
13 topic of this tweet was administrative
14 detention; is that right?

15 A. Yes. Illegal administrative
16 detention, correct.

17 Q. Understood. And the purpose of this
18 tweet was to elevate public awareness of
19 illegal -- pardon me -- administrative
20 detention; is that correct?

21 A. Yes.

22 Q. That was -- right. Okay.

23 A. Yes. Because many people don't
24 understand what administrative detention is.

25 Q. Understood.

1 MR. SINAIKO: So let's go to
2 Tab 25, which we will mark as Exhibit 14.

3 (Deposition Exhibit No. 14 was
4 marked for identification.)

5 BY MR. SINAIKO:

6 Q. Ms. Ghannam, can you see Exhibit 14
7 in front of you?

8 A. Most of it. Your face and my face
9 block off the right side of it.

10 Q. Let's fix it so that you can see --
11 I want to do whatever -- can you see it better
12 now?

13 A. That works.

14 Q. All righty. So can you see the
15 document now?

16 A. Yes.

17 Q. And can you tell me whether that's a
18 tweet that you posted to the Observer Mission's
19 Twitter feed?

20 A. Yes.

21 Q. And when did you make this posting
22 to the Observer Mission's Twitter feed?

23 A. November 28, 2020, at 2:27 p.m.

24 Q. By any chance, do you know where you
25 were located physically when you made that

1 posting?

2 A. Thanksgiving, that first year, after
3 COVID -- I believe we were in Washington.

4 Q. But you weren't in the Observer
5 Mission building?

6 A. No.

7 Q. Okay. And the purpose of -- would
8 it be fair to say that the purpose of this
9 tweet was to call public attention to a letter
10 that Dr. Mansour wrote to a UN official?

11 A. Well, I can't see the original
12 letter, but either Dr. Riyadh would have written
13 it or Ambassador Feda would have written it, if
14 Dr. Riyadh was out of town.

15 Q. Let's go to the attachment because
16 that's part of the exhibit.

17 A. Okay.

18 Q. Let me just ask the question again.
19 Do you see that the document referenced in the
20 Twitter post is a letter that --

21 A. A letter by --

22 Q. I'm sorry?

23 A. You would have to scroll all the way
24 to the bottom to see who it was written by.

25 Q. Certainly. Let's do that so you get

1 to see it.

2 A. Go up a little more, please. I
3 don't know who drafted it. It was either
4 Ambassador Feda or Dr. Riyadh. But most
5 likely --

6 Q. Let's go down to the bottom of the
7 letter for just a moment. You will see that it
8 appears to be signed by Dr. Khalil El-Halabi.
9 Do you see that?

10 A. Yes.

11 Q. Do you understand this to be a
12 letter that Dr. Khalil El-Halabi wrote to a UN
13 official or to -- or perhaps to, you know,
14 Ambassador Mansour?

15 A. It could be -- it could have been
16 that he was quoted in the letter. I didn't
17 write the letter. I just posted it.

18 Q. Okay. The purpose of the Twitter
19 post was to disseminate this letter publicly to
20 draw attention to the issue -- raise public
21 attention to the issue raised in the letter;
22 correct?

23 A. Yes.

24 MR. SINAIKO: Let's go to Tab
25 26, which we will mark as Exhibit 15.

1 (Deposition Exhibit No. 15 was
2 marked for identification.)

3 BY MR. SINAIKO:

4 Q. Ms. Ghannam, do you have Exhibit 15
5 in front of you?

6 A. I do.

7 Q. Do you recognize this to be another
8 post that you put on the Observer Mission's
9 Twitter feed?

10 A. Yes.

11 Q. And when did you put this post on
12 the Observer Mission's Twitter feed?

13 A. January 11, 2021 at 9:16 a.m.

14 Q. And it says, on the top of the first
15 line, statement by PMOFA. Do you see that?

16 A. Yes.

17 Q. What is PMOFA?

18 A. The Palestinian Ministry of Foreign
19 Affairs.

20 Q. So this was a tweet by which the
21 Observer Mission was disseminating a message
22 created by the Ministry of Foreign Affairs;
23 correct?

24 A. This is correct.

25 Q. And the Ministry of Foreign Affairs,

1 that is -- or the statement by the Ministry of
2 Foreign Affairs, pardon me, is that the
3 document attached at the bottom of the tweet?

4 A. Yes. I believe -- I believe it's
5 actually a media brief drafted by NAD, the
6 Negotiation Affairs Department.

7 Q. And it's the PLO -- that's the
8 Palestine Liberation Organization Negotiation
9 Affairs Department; correct?

10 A. Yes.

11 Q. And is that part of the Ministry of
12 Foreign Affairs?

13 A. No.

14 Q. What is the connection between the
15 Negotiation Affairs Department and the Ministry
16 of Foreign Affairs, if any?

17 A. I don't know the exact legal
18 connection between the two. My specialty is
19 not in that realm of work.

20 My work was to just disseminate the
21 information as it pertains to the illegality of
22 the State of Israel's illegal occupation of
23 Palestinians as a violation of Fourth Geneva
24 Convention, as a violation of the UN mandate,
25 as a violation of the UN charter, that they

1 have to take full responsibility of its
2 citizens of the occupying -- the occupying
3 power has to take full responsibility of the
4 citizens it is occupying; hence, the reason for
5 the information regarding the lack of COVID
6 vaccinations to the occupied people.

7 Q. Okay. So the purpose of this post
8 was to elevate public awareness of the issue
9 that was being raised in this paper prepared by
10 the Palestine Liberation Organization
11 Negotiation Affairs Department; is that
12 correct?

13 MR. BERGER: Objection, asked
14 and answered. You may answer again. You may
15 answer again.

16 THE WITNESS: Yes, because,
17 again, if you note, at the end, I write the
18 full statement below at UN, which means I
19 publicly retweet back to the United Nations
20 that what I am stating is a complete violation
21 of the UN mandate, of the UN charter.

22 And, therefore, it is the occupying
23 power's obligation to administer vaccines,
24 vaccinations to the occupyees, so they are in
25 violation of international law and it is

1 illegal what they are doing to the occupied
2 people of Palestine.

3 BY MR. SINAIKO:

4 Q. So would it be fair to say that the
5 purpose of this tweet is to draw to public
6 attention conduct that the Observer Mission
7 regards as a violation of UN requirements?

8 A. Yes.

9 MR. SINAIKO: Okay. Let's go
10 to Tab 27. That will be Exhibit 16.

11 (Deposition Exhibit No. 16 was
12 marked for identification.)

13 BY MR. SINAIKO:

14 Q. And Ms. Ghannam, can you see Exhibit
15 16? I think the video might be frozen again so
16 I'm not sure you can see it.

17 A. Not yet.

18 MR. SINAIKO: Let's give it a
19 moment and if it doesn't -- if it doesn't pop
20 up, Mitch, maybe we can show her the document
21 on your laptop.

22 MR. BERGER: It's popping up.

23 THE WITNESS: Okay. Yes, I
24 remember this.

25 BY MR. SINAIKO:

1 Q. Maybe you can start by telling us,
2 in a high level way, whether this is yet
3 another tweet that you posted to the Observer
4 Mission's Twitter account?

5 A. Yes, I did.

6 Q. Okay. And this was done on February
7 14, 2021; correct?

8 A. Correct.

9 Q. Okay. And what exactly was this
10 Twitter, tweet -- let me withdraw that.

11 What exactly was this tweet
12 disseminating?

13 A. Why was it disseminated; is that
14 your question?

15 Q. I was asking what was being
16 disseminated through this tweet.

17 A. Oh. It was stories of the
18 illegality of the Israeli citizenship law which
19 forces citizens to stay away from each other
20 because of the illegal occupation.

21 Q. Okay. And the purpose of this tweet
22 was to draw public attention to an Israeli law
23 that the Observer Mission --

24 A. An illegal Israeli law --

25 Q. Let me finish the question. Am I

1 correct that the purpose of this tweet was to
2 draw attention to an Israeli law that the
3 Observer Mission regarded as inconsistent with
4 UN mandates?

5 A. Yes.

6 MR. SINAIKO: Okay. Let's go
7 to Tab 28, which we will mark as Exhibit 17.

8 (Deposition Exhibit No. 17 was
9 marked for identification.)

10 BY MR. SINAIKO:

11 Q. All right. Ms. Ghannam, are you
12 able to see Exhibit 17?

13 A. Not yet.

14 Q. Okay. Would you let me know when it
15 pops up?

16 A. Okay.

17 Q. This is so much easier in person, I
18 have to tell you.

19 MR. BERGER: I've got it on my
20 laptop, so let me show it to you. Can you see
21 it from here? There you go. It's on the big
22 screen now.

23 THE WITNESS: Okay.

24 BY MR. SINAIKO:

25 Q. Do you recognize this to be another

1 tweet that you posted to the Observer Mission's
2 Twitter account?

3 A. Yes.

4 Q. And it's a tweet that you posted on
5 May 11; correct?

6 A. Yes.

7 Q. And this is a tweet -- what was the
8 nature of this tweet? Maybe you can tell us
9 that. I'll try to ask it in a more open-ended
10 way.

11 A. Sure. So a Mark Ruffalo, which many
12 of you know is a celebrity, used his platform
13 to expose the illegality of the potential
14 expulsion of 1500 Palestinians from occupied
15 Jerusalem.

16 Q. And in this tweet, the Observer
17 Mission thanked Mr. Ruffalo for making his
18 post; is that correct?

19 A. Yes, I did.

20 Q. Okay. Let's go to the next page of
21 this one. Is that Mr. Ruffalo's post that you
22 were forwarding?

23 A. I believe I was retweeting it, yes.

24 Q. Okay. And you see that
25 Mr. Ruffalo's post, in turn, attached a

1 document?

2 A. Although. Would you mind going back
3 for a second, because I think --

4 Q. Not at all.

5 A. -- I might have just retweeted.
6 Okay. I'm sorry, go ahead. Uh-huh.

7 Q. Do you see that Mr. Ruffalo's tweet
8 that the Observer Mission retweeted to its own
9 Twitter account, in turn, attached the
10 document?

11 A. I may not have noticed it at the
12 time. I don't recall right now. There was a
13 lot going on during this time period.

14 Q. Understood. But you see that there
15 is a document attached to Mr. Ruffalo's tweet;
16 correct?

17 A. I do see that.

18 Q. And do you understand what that
19 document is?

20 A. You'd have to open it for me to look
21 at it. I don't recall.

22 Q. Let's go to the next page.

23 A. Okay.

24 Q. Do you understand what that might
25 be?

1 A. No.

2 Q. Do you want to -- do you need --
3 maybe we should show her the rest of the pages
4 of it.

5 A. Assuming it's some sort of petition.

6 Q. Okay. Right. So Mr. Ruffalo's
7 tweet -- well, Mr. Ruffalo's tweet attached a
8 petition that members of the public could sign
9 relating to this topic; correct?

10 A. It appears so.

11 Q. And the Observer Mission retweeted
12 Mr. Ruffalo's tweet to bring Mr. Ruffalo's
13 tweet to the attention of a broader audience;
14 correct?

15 A. Yes.

16 MR. SINAIKO: Okay. Let's go
17 to Tab 29, which will be Exhibit 18.

18 (Deposition Exhibit No. 18 was
19 marked for identification.)

20 BY MR. SINAIKO:

21 Q. Okay. We're going to be on Tab 29.
22 That will be Exhibit 18.

23 Mr. Ghannam, if you can just let me
24 know when you are able to see that.

25 MR. BERGER: I'll show it to

1 her on my laptop.

2 MR. SINAIKO: I've got to say,
3 I can't wait until we're able to do these
4 things in person again. This is just
5 incredibly painful.

6 MR. BERGER: She's got it on
7 my laptop for now, until it pops up on the big
8 screen.

9 BY MR. SINAIKO:

10 Q. So Ms. Ghannam, can you see
11 Deposition Exhibit 18 now?

12 A. Yes.

13 Q. And this is another tweet that you
14 posted to the Observer Mission's Twitter
15 account; is that correct?

16 A. Yes.

17 Q. And you made that post on May 15,
18 2021; is that correct?

19 A. Yes.

20 Q. There, now you can see it on the big
21 screen. Once your video pops up, I know you
22 can see it.

23 So you've got it on the screen in
24 front of you now?

25 A. Yes.

1 Q. Was this -- I see that this one,
2 this tweet actually has the SaveSheikhJarrah
3 hashtag; do you see that?

4 A. Yes.

5 Q. Would it be fair to say that part of
6 the purpose of that hashtag was to magnify the
7 attention, the public attention that this
8 Twitter posting would receive?

9 A. Yes.

10 Q. Okay. And the purpose of this --
11 well, what was the document? It looks like
12 there's a document attached to this tweet, is
13 that right, or maybe this is retweeting?

14 A. Retweeting, from what I can recall.
15 I don't know if that's a video or just a
16 picture. If I have to guess, it's just a
17 picture because what happened is that the
18 occupying power indiscriminately and illegally
19 bombed and destroyed the offices of the
20 Associated Press and Al Jazeera Arabic in Gaza
21 and, therefore, the occupied region of Gaza was
22 cut off from the rest of the world, so we had
23 to rely on tweets coming out from the region to
24 show the world what was happening illegally
25 there.

1 Q. So would it be fair to say that the
2 purpose of this tweet was to call public
3 attention to the Observer Mission's view that
4 Israel had indiscriminately and illegally
5 bombed and destroyed the offices of the
6 Associated Press in Al Jazeera?

7 A. The purpose of this tweet is to
8 highlight the view of the State of Palestine
9 and the United Nations in terms of the
10 illegality of what Israel was doing in terms of
11 conducting potential war crimes against nearly
12 two million people who are subjected to an
13 illegal blockade of nearly 14 years, which is
14 deemed illegal by the United Nations, yes.

15 All of this falls within my
16 framework at the UN because all of these issues
17 and everything that you have asked me thus far
18 are things that the UN discusses regularly as
19 illegal and against the UN charter and the UN
20 framework.

21 Q. I notice -- I notice, Ms. Ghannam,
22 that the first line of this tweet references
23 @POTUS. Do you see that?

24 A. Yes, the President of the United
25 States.

1 Q. And why would this tweet make
2 reference to the President of the United
3 States?

4 A. Because the United States of America
5 is a permanent member of the UN Security
6 Council, and the United States, as a permanent
7 member of the Security Council, regularly votes
8 against any and all resolutions that speak
9 against the illegal occupation of the State of
10 Palestine.

11 So while the whole world watches
12 this indiscriminate bombing of this illegal
13 occupation, the United States happens to be the
14 only member of the Security Council that cannot
15 publicly make a statement saying that this is
16 wrong.

17 Q. And you wanted to -- is it true,
18 Ms. Ghannam, would it be fair to say,
19 Ms. Ghannam, that one of the purposes of this
20 tweet was to raise awareness of the positions
21 that the Trump administration was taking within
22 the United States?

23 A. My purpose was to bring forth the
24 policies that the United Nations as a voting
25 member of the -- excuse me, the United States,

1 as a voting member of the United Nations and as
2 a permanent member of the United Nations
3 Security Council and their extremely important
4 role at the United Nations, and how are they
5 able to sit back and take a side seat to an
6 issue distressing to many people around the
7 world, an issue that's illegal.

8 Q. Was part of the purpose of this
9 tweet to raise awareness among the American
10 public of the position that its government was
11 taking?

12 MR. BERGER: Objection, asked
13 and answered. You may answer again.

14 BY MR. SINAIKO:

15 Q. You may answer.

16 A. The objection was to raise awareness
17 that the United States of America, which is a
18 voting member of the Security Council of the
19 United Nations, and a permanent member of the
20 United Nations security member, and the fact
21 that all work conducted in the region, gets the
22 blessing of the United States, through the
23 United Nations, and, therefore, the fact that
24 the United States of America is unable to make
25 a public statement regarding something where

1 the majority of the world was able to demonize
2 in one way or another was perplexing, yes.

3 Q. Okay. Just going to try one more
4 time. The objective was to raise that
5 awareness among the American public; is that
6 correct?

7 MR. BERGER: Objection. It's
8 not only asked and answered, but the reason why
9 you keep coming back is that it's
10 argumentative. So I object to the
11 argumentative questioning of this witness.

12 MR. SINAIKO: She can answer
13 the question.

14 MR. BERGER: Do you have
15 anything to add to your previous answer?

16 THE WITNESS: No.

17 MR. SINAIKO: She can answer
18 the question that I ask, not the questions that
19 you ask, Mr. Berger.

20 MR. BERGER: You've asked this
21 question three times. It's argumentative,
22 asked and answered. You may answer it again.

23 MR. SINAIKO: I would like the
24 question read back please, Karen.

25 (Reporter read back from the

1 record.)

2 THE WITNESS: No.

3 MR. SINAIKO: Let's mark as
4 our next exhibit Tab 30. I think this will be
5 Exhibit 19.

6 (Deposition Exhibit No. 19 was
7 marked for identification.)

8 BY MR. SINAIKO:

9 Q. Ms. Ghannam, can you see Exhibit 19
10 in front of you?

11 A. Yes.

12 Q. Okay. And you recognize -- what do
13 you recognize this to be, if anything?

14 A. I recognize this very well. It was
15 a mother and a child who were stuck under the
16 rubble of their house after it being illegally
17 shelled and begging for help so that they were
18 not to die.

19 Q. This was a Twitter post that was put
20 on -- that you put on the Observer Mission's
21 Twitter feed; correct?

22 A. Absolutely correct.

23 Q. And the topic was the one that you
24 just mentioned; correct?

25 A. Yes.

1 Q. And the purpose of this Twitter feed
2 was to raise public awareness about the conduct
3 that is described in this Twitter post and the
4 Observer Mission's position with respect to
5 that conduct; correct?

6 A. Yes.

7 MR. SINAIKO: Okay. Let's go
8 to Tab 31, which we will mark as Exhibit 20.

9 (Deposition Exhibit No. 20 was
10 marked for identification.)

11 BY MR. SINAIKO:

12 Q. Do you see Deposition Exhibit 20 on
13 the screen?

14 A. No. Yes, now I do.

15 Q. And do you recognize that to be
16 another tweet that you posted to the Observer
17 Mission's Twitter account on May 17, 2021?

18 A. Yes.

19 Q. Okay. And do you see that this
20 Twitter post makes reference to AOC?

21 A. Yes.

22 Q. Who is that?

23 A. Alexandria Ortezt -- I always forget
24 her name. The representative from New York.

25 Q. Right. Alexandria Ocasio-Cortez; is

1 that right?

2 A. Yes.

3 Q. And what about Bush?

4 A. Yes. Cori Bush.

5 Q. And what about --

6 A. John Oliver.

7 Q. Uh-huh, who else?

8 A. Ali Velshi, and then Reid, I forget
9 his first name, yes.

10 Q. And what information was this
11 Twitter post conveying?

12 A. That the use of the word "apartheid"
13 is not so illegal, it's not deemed as taboo
14 anymore.

15 Q. Okay. And the purpose of -- the
16 purpose of this, is it correct that the purpose
17 of this tweet was to disseminate publicly the
18 Observer Mission's view that the State of
19 Israel engages in apartheid?

20 A. The purpose of this tweet is to
21 share information that is left up to the
22 general public to decipher in any way possible
23 that they see fit in terms of the illegalities
24 of what is happening to the people of Palestine
25 that is repeatedly discussed and repeated at

1 the United Nations.

2 It is not up to me to decide what
3 people take from what I post.

4 MR. SINAIKO: Okay. Let's put
5 up Tab 32 and let's mark that as our next
6 exhibit, which will be Exhibit 21.

7 (Deposition Exhibit No. 21 was
8 marked for identification.)

9 BY MR. SINAIKO:

10 Q. Ms. Ghannam, can you see Exhibit 21?

11 A. Not yet.

12 MR. BERGER: Every time I show
13 her my laptop, it pops on the video.

14 MR. SINAIKO: It's like
15 clockwork.

16 (Off-the-record discussion
17 held.)

18 BY MR. SINAIKO:

19 Q. Okay. Can you see the document now,
20 Exhibit 21?

21 A. Yes.

22 Q. And that's another posting that you
23 made to the Observer Mission's Twitter account?

24 A. Yes.

25 Q. And that was a retweet?

1	A. Yes.
---	---------

2 Q. It was a retweet of a tweet that
3 originally was put up by Senator Warren;
4 correct?

5	A. Yes.
---	---------

6 Q. And do you think you retweeted
7 Senator Warren's tweet the same day that
8 Senator Warren put it up on her own feed?

9 A. I can't tell you.

10 Q. In any event, the purpose -- is it
11 correct that the purpose of this tweet was to
12 bring to the attention of the public Senator
13 Warren's view that the Biden administration
14 should press for a just, lasting two-state
15 agreement?

16 A. The purpose of this tweet is to
17 press on the viewpoint that a lasting two-state
18 agreement is needed to see a just and viable
19 peace in the region, something that the United
20 Nations had been working towards for decades
21 now and is the longest standing occupation and
22 file at the United Nations.

23 MR. SINAIKO: Okay. Let's go
24 to Tab 33, which we will mark as Exhibit 22.

25 (Deposition Exhibit No. 22 was

1 marked for identification.)

2 MR. SINAIKO: And Mitch, if
3 you could just put the laptop in front of her
4 now so that this works more promptly this time.

5 MR. BERGER: Yeah. I don't
6 have it yet. See, it worked instantly.

7 MR. SINAIKO: Like magic.

8 BY MR. SINAIKO:

9 Q. Anyway, Ms. Ghannam, do you see
10 Exhibit 22 in front of you?

11 A. I do.

12 Q. And do you recognize that to be a
13 tweet that you posted to the Observer Mission's
14 Twitter feed on May 24th of this year?

15 A. Yes.

16 Q. And the purpose of this --

17 A. Yes, I recognize it.

18 Q. Is it correct that the purpose of
19 this Twitter feed was to bring to public
20 attention criticism of the Biden administration
21 in an article that Newsweek had published?

22 A. The purpose of this retweet was to
23 bring attention to the fact that the United
24 States, a permanent country of the Security
25 Council who has the right to veto anything they

1 want in the Security Council, and a member of
2 the larger UN General Assembly, has gone ahead
3 and provided the State of Israel with smaller
4 bombs to continue doing the work that they have
5 done illegally.

6 MR. SINAIKO: Okay. And let's
7 mark, as Exhibit 23, a Twitter post dated July
8 9 of 2021. That will be Tab 34, Cosette.

9 (Deposition Exhibit No. 23 was
10 marked for identification.)

11 BY MR. SINAIKO:

12 Q. Okay. And Ms. Ghannam, do you
13 recognize -- can you see Deposition Exhibit 23
14 in front of you now?

15 A. Yes.

16 Q. And do you recognize that to be a
17 posting that you made to the Observer Mission's
18 Twitter feed earlier this month?

19 A. Yes, I retweeted it.

20 Q. Right. And this is a retweet from
21 the PLO's Negotiation Affairs Division; is that
22 right?

23 A. Department, yes.

24 Q. Sorry. I got the title -- I
25 misspoke. It's the Negotiation Affairs

1 Department?

2 A. That's okay. Yes.

3 Q. Okay. And this is another --
4 another tweet, the purpose of which is to bring
5 to public attention the Observer Mission's
6 views about annexation of territory; is that
7 correct?

8 A. Particularly the annexation wall,
9 yes.

10 Q. Okay.

11 A. And the illegal settlement units
12 that have been established in occupied illegal
13 territories, yes. And the number of civilian
14 deaths as well.

15 Q. Anything else?

16 A. No. The tweet is pretty
17 self-explanatory.

18 MR. SINAIKO: Excellent. We
19 can take that one down. If it's okay -- if
20 it's okay with everybody, I like to just go off
21 the record for five minutes.

22 MR. BERGER: Yeah.

23 MR. SINAIKO: Good enough.

24 Thanks.

25 THE VIDEOGRAPHER: We are now

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